

**AFFIDAVIT OF SPECIAL AGENT EUGENE WHEELIS IN SUPPORT OF  
AN APPLICATION FOR A SEARCH WARRANT**

I, Eugene A. Wheelis, having been duly sworn, hereby depose and state the following:

**Introduction and Agent Background**

1. I have been employed as a special agent with the U.S. Department of State, Diplomatic Security Service ("DSS"), since September of 2017. I have completed a training program in conducting criminal investigations at the Federal Law Enforcement Training Centers in Brunswick, Georgia (January, 2018) and the DSS Basic Special Agent Course in Dunn Loring, Virginia (April 2018). I have been assigned as a special agent to the DSS Boston Field Office ("BFO") since April, 2018. Prior to my employment with DSS, I obtained my Bachelor of Arts degree with honors from the American University (May, 2012).
2. My current duties as a DSS Special Agent include conducting investigations involving the fraudulent acquisition, production, and misuse of U.S. immigration documents, U.S. passports, U.S. visas and identity documents. Due to my training, experience, and conversations with other law enforcement officers, I am familiar with the methods, routines, and practices of document counterfeiters, vendors, and persons who fraudulently obtain or assume false identities.
3. I am personally involved in the investigation of Yris Solmeida SANCHEZ ("SANCHEZ"). I am investigating SANCHEZ in connection with her violation of numerous federal criminal laws, including but not limited to misuse of a passport, in violation of 18 U.S.C. § 1544, aggravated identity theft, in violation of 18 U.S.C. § 1028A, false representation of a Social Security number, in violation of 42 U.S.C. § 408(a)(7)(B), wire fraud, in violation of 18 U.S.C. § 1343, and false statement in a credit application, in violation of 18 U.S.C. § 1014 (collectively, the "TARGET OFFENSES").

4. This affidavit is submitted in support of an application for a search warrant for 29 West Milton Street, Apartment #2, Hyde Park MA 02136, as described more fully in Attachment A, for the items set forth in Attachment B,
5. This affidavit is also made in support of a complaint against and an arrest warrant for SANCHEZ for the following violations: misuse of a passport, in violation of 18 U.S.C. § 1544, and aggravated identity theft, in violation of 18 U.S.C. § 1028A.
6. The information set forth in this affidavit is based on information provided to me by the Massachusetts Registry of Motor Vehicles (“RMV”), the Boston Passport Agency, other law enforcement agencies, other federal agents employed by DSS (both assigned to the BFO and globally), and through my review of records and other investigative activity. This affidavit is intended to show merely that there is probable cause for the requested warrants and does not set forth all of my knowledge about this matter.

### **Probable Cause**

#### **Applications in YGV Identity**

7. On October 3, 2005 an applicant executed form DS-11 (Application for a U.S. Passport) # xxxxx1902 at the U.S. Post Office in Harvard Square, Cambridge, MA. The individual applying for the passport listed her identity as YGV<sup>1</sup>, date of birth xx/xx/1977, with a Social Security number (“SSN”) ending in 4172. In support of this application, the same individual provided a Massachusetts driver’s license # Sxxxx7092 and a Puerto Rican birth certificate. The applicant listed AV (DOB xx/xx/1960) as her mother and AG (DOB

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<sup>1</sup> Throughout this affidavit, the initials “YGV” are used to refer to the name of the individual whose identity has been used by SANCHEZ. I am aware of the true identity of YGV, including her SSN and date of birth. Likewise, this affidavit uses the initials AV and AG to refer to the parents of YGV; their true identities are known to me. This affidavit uses these initials in order to protect the privacy of the victim of SANCHEZ’s identity theft.

xx/xx/1946) as her father. As a result of this application, U.S. passport # xxxxx1902 was issued in the name of YGV.

8. On September 11, 2006, an applicant executed DS-11 # xxxxx2274 at the Harvard Square Post Office. On this DS-11, the applicant again claimed the name YGV with date of birth xx/xx/1977 and SSN ending in 4172.<sup>2</sup> The photograph included with this application is of the same individual whose photograph appears on DS-11 # xxxxx1902. MA driver's license #Sxxxx7092 was again used as proof of identity. AV and AG were again listed as the applicant's parents. As a result of this application, U.S. Passport # xxxxx2274 was issued in the name of YGV.
9. On June 9, 2016, form DS-82 (Passport Renewal Application) # xxxxx3637 was mailed to the National Passport Center ("NPC") in Portsmouth, NH for processing. On this form, the applicant again claimed the name YGV with date of birth xx/xx/1977 and SSN ending in 4172. Included with the DS-82 was passport # xxxxx2274. The individual in the photograph included with DS-82 # xxxxx3637 appears to be the same individual pictured in applications # xxxxx1902 and # xxxxx2274. As a result of this application, U.S. passport #xxxxx2824 was issued in the name of YGV.
10. On October 15, 2018, an applicant submitted an application for a "REAL ID" driver's license to the RMV in the name of YGV. Applicants applying for a REAL ID in Massachusetts for the first time must do so in person, provide proof of identity, and provide proof of legal presence in the United States, among other requirements. To satisfy these requirements, this individual submitted a signed Social Security card bearing the name YGV with the SSN ending in 4172. Additionally, this individual supplied U.S.

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<sup>2</sup> The prior U.S. passport issued in the name of YGV was reported stolen.

passports # xxxxx2274 and #xxxxx2824 as proof of legal status. The applicant also marked “yes” on the application to the question “Are you a citizen of the United States of America?” As a result of this application, MA DL # Sxxxx7092 was renewed and upgraded to a REAL ID. The RMV photograph of this applicant and present on MA DL #Sxxxx7092 depicts the same person who appears on the passport applications and U.S. passports #xxxxx2824 and # xxxxx2274.

11. On 07/08/2019, BFO investigative staff requested the Puerto Rico Demographic Registry verify the birth certificate used to support the above passport applications. Officials with the Puerto Rico Demographic Registry confirmed that a legitimate record exists for the birth of YGV, DOB xx/xx/1977 to mother AV and father AG. The Puerto Rico Demographic Registry also confirmed that there is no record of YGV having any siblings. On 08/27/2019, I contacted the Social Security Administration (“SSA”) in order to verify that the Social Security number ending in 4172 associated with YGV is a valid record. SSA confirmed that this is a valid SSN assigned to YGV.

#### Identification of Individual Using the YGV Identity

12. Social media queries performed during the investigation produced a Facebook account with the user ID “Yolanda Sanchez” and page ID “facebook.com/yris.sanchez” (the SANCHEZ Account”). The individual pictured in this publicly available profile is the same individual pictured in all three passport applications submitted in the YGV identity and the same individual pictured in MA driver’s license # Sxxxx7092. Additionally, the owner of the SANCHEZ Account listed herself as the owner of a business called HAIR BY YRIS. Visiting the public Facebook account associated with HAIR BY YRIS shows a business page for a Boston-based hair studio bearing the name D’YRIS SALON.

National Passport Center records indicate that the check used to pay the passport renewal fee for passport #xxxxx3637 was issued from a Citizens Bank account in the name of D'YRIS SALON.

13. DSS agents stationed in Santo Domingo, Dominican Republic, with the assistance of Dominican authorities, located a birth certificate for Yris Solmeida Jimenez SANCHEZ. The certificate states SANCHEZ was born on xx/xx/1969 in Bani, Dominican Republic. The certificate lists the names of SANCHEZ's mother (Carmen Luisa Jiminez) and her father (Francisco Sanchez Segura). The certificate also indicates the issuance of Dominican cedula, # xxxxx4-010 to Francisco Sanchez Segura. A search of the Dominican cedula database for cedula # xxxxx4-010 produced a photograph of Francisco Sanchez Segura, as well as his date of birth of xx/xx/1929.
14. DSS agents in the Dominican Republic also identified five children as being registered to Carmen Luisa Jimenez: Hector Sanchez Jiminez, Carlos Sanchez Jiminez, Yunior Sanchez, and Carmen Sanchez (*i.e.*, the siblings of SANCHEZ) and Yris Solmeida Jimenez SANCHEZ. Agents obtained cedula information, including photographs, for Hector, Carlos, and Yunior Sanchez. A search of Department of State databases shows Carmen Sanchez (now Carmen Correa) is a naturalized U.S. citizen, and immigration paperwork shows her address was xxxx Blake Lane, Fairfax, VA.
15. Facebook produced records of the SANCHEZ Account in response to a federal search warrant. Numerous posts and photographs associated with the SANCHEZ Account indicate a daughter/parent relationship between the user of the SANCHEZ Account and Francisco Sanchez Segura and/or Carmen Jiminez. For example, on July 28, 2019, the user of the SANCHEZ Account posted a photograph of SANCHEZ with an elderly adult

male. The man in the photograph appears to be Francisco Sanchez Segura – *i.e.*, the man depicted in the photograph of cedula # xxxxx4-010. The caption on this post reads “Tu sonrisa me enamora padre mio!! Feliz dia del padre!” This translates from Spanish to English as: “I love your smile, my father. Happy father’s day.”<sup>3</sup>

16. On 01/11/2017, the user of the SANCHEZ Account posted a message referencing Carmen Luisa Jiminez. The last two sentences of this message read “Descansa en Paz Madre Mia!!” and referenced a name that included Carmen Jimenez Pimentel. This translates to “rest in peace, my mother! Carmen Jimenez Pimentel.” There are numerous additional examples of the SANCHEZ Account posting such messages indicating a paternal and maternal relationship between the account owner and Francisco Sanchez Segura or Carmen Jimenez, respectively.
17. According to Facebook records, the use of the SANCHEZ Account listed several other users as family members. Among this group of users listed as family members are accounts in the name of Hector Sanchez Jimenez, Carlos Sanchez, Yunior Sanchez, and Carmen Sanchez. Photographs posted by these accounts, as well as photographs posted by other accounts with these accounts “tagged,” show individuals who appear to me – based on a comparison photographs present in the pertinent cedula and, in the case of Correa, her immigration and U.S. passport photos – to be SANCHEZ’s siblings. Numerous comments and photo captions indicate that the user of the SANCHEZ Account has a sibling relationship with Hector Sanchez, Yunior Sanchez, Carlos Sanchez, and Carmen Correa.

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<sup>3</sup> Any Spanish translations in this affidavit are approximate and unofficial. Note that July 28, 2019 was Father’s Day in the Dominican Republic.

18. A search of law enforcement databases using SANCHEZ's name and date of birth produced a hit to an FBI number that was linked to various names, including Luz Campos.<sup>4</sup> SANCHEZ, in the CAMPOS identity, was arrested in 1997 and charged with felony forgery charges. State Department records show a June 1997 passport application in the name Luz Campos. This application listed Carmen Correa at xxxx Blake Lane, Fairfax VA (the address associated with SANCHEZ's sister) as the applicant's emergency contact. In connection with this application, the State Department issued a passport in the name of Luz Campos. I have reviewed the photograph associated with this passport and have compared it with the photographs depicted on U.S. passports xxxxx1902 and xxxxx2274, and I conclude that all photographs depict SANCHEZ. Based on my investigation, and my training and experience, I believe that "Luz Campos" is another alias used by SANCHEZ.
19. Criminal records indicate that SANCHEZ was arrested in Fairfax County, VA multiple times between 1992 and 1996 in her true name (Yris Solmeira [*sic*] SANCHEZ) for fraud-related charges. Arrest reports obtained from the Fairfax County Sheriff's Department show SANCHEZ's nationality listed as Dominican.
20. Among these reports is an investigation and arrest report describing an incident that occurred on February 25, 1994. Fairfax Police were notified by a victim that SANCHEZ had stolen its Automatic Teller Machine ("ATM") card and had been withdrawing money from its bank account without its consent. The victim in this case is noted as being a roommate of SANCHEZ's sister. After an investigation, which included Fairfax police

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<sup>4</sup> FBI identifiers are issued when an individual is arrested and fingerprinted, and are unique to the set of fingerprints.

obtaining photos from the bank showing SANCHEZ using the victim's ATM card, SANCHEZ was charged with one count each of credit card theft and credit card fraud. On the warrant and accompanying arrest report, SANCHEZ's full name is listed as "Yris S. SANCHEZ", date of birth xx/xx/1968 and her address is listed as xxxx Blake Lane, Fairfax, VA. Officers served the warrant on June 22, 1994 and arrested SANCHEZ at this address.

21. Documents obtained from the Massachusetts RMV indicate that in 2008, SANCHEZ, using the YGV identity, was also investigated by the Massachusetts State Police for identity fraud relating to MA driver's license # Sxxxx7092. I understand that the Massachusetts State Police interviewed SANCHEZ and that, while she admitted to using an alias, she indicated that her true name was YGV.<sup>5</sup>

SANCHEZ's use of YGV Passport

22. An analysis of travel records within Customs and Border Protection ("CBP") databases showed that passport # xxxxx2824 in the name of YGV was used for frequent international travel between 2016 and 2019. Specifically:
- a. On January 1, 2016 passport # xxxxx2274 was presented to board United Airlines flight 1486 departing Newark, New Jersey ("EWR") *en route* to Gregorio Luperon International Airport, Puerto Plata, Dominican Republic ("POP"). The same passport was used on United Airlines flight 1484 returning from POP and landing at EWR on January 8, 2016.
  - b. On August 8, 2016 passport # xxxxx2824 was presented to board American

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<sup>5</sup> The reports associated with this investigation do not reference SANCHEZ under her true name, but rather as YGV. The Massachusetts State Police were investigating whether the person using the name YGV (*i.e.*, SANCHEZ) had also used another identity.



Airlines flight 1481 departing Miami International Airport (“MIA”), *en route* to Santo Domingo, Dominican Republic (“SDQ”). The same passport was used on American Airlines flight 1154 departing SDQ and landing at MIA on August 17, 2016.

- c. On May 27, 2017 passport # xxxxx2824 was presented to board JetBlue flight 923 departing Boston Logan Airport (“BOS”) *en route* to Cibao International Airport, Santiago, Dominican Republic (“STI”). The same passport was used on JetBlue flight 924 returning from STI and landing at BOS on June 12, 2017.
- d. On September 25, 2017 passport # xxxxx2824 was presented to board JetBlue flight 1528 departing POP and landing at JFK International Airport (“JFK”).
- e. On November 26, 2018 passport # xxxxx2824 was presented to board Delta flight 391 departing SDQ and landing at JFK.
- f. On July 22, 2019 passport # xxxxx2824 was presented to board JetBlue flight 129 departing BOS *en route* to SDQ. The same passport was used on JetBlue flight 830 returning from SDQ and landing at BOS on August 10, 2019. SANCHEZ (using the name YGV) was interviewed by CBP officers at Logan Airport upon disembarking. During this interview, SANCHEZ presented U.S. passport # xxxxx2824 to the officers.

23. Records obtained from Facebook show that the SANCHEZ Account posted “check-ins”<sup>6</sup> corresponding with several of the above flights. Specifically:

- a. On 08/08/2016, the user of the SANCHEZ Account checked in to “Boston Logan

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<sup>6</sup> Check-In is a function on Facebook where users are able to mark themselves present at a particular location by “checking in” at that location.

International Airport”. Eleven hours later the user of the SANCHEZ Account checked in to a location titled “Catalonia Santo Domingo”. Latitude/longitude coordinates associated with this check in show the post was made from the Dominican Republic.

- b. On 08/17/2017, the user of the SANCHEZ Account checked in to “American Airlines First Class Cabin”. GPS coordinates from this post indicate it was made near Miami.
- c. On 05/28/2017, the user of the SANCHEZ Account checked in to “Puerto Plata”, a town in the Dominican Republic. The caption on this post reads “En Familia”, which by my own translation, means to “with family.” GPS coordinates indicate this post was made in the Dominican Republic.
- d. On 06/12/2017, the user of the SANCHEZ Account checked in to “Boston Logan International Airport”. The caption on this post is “Llegueeee!!”, which translates to “I arrived!”
- e. On 09/19/2017, the user of the SANCHEZ Account checked in again to Boston Logan International Airport. That same day, the user of the SANCHEZ Account checked in to “Santiago”, a town in The Dominican Republic.
- f. On 09/25/2017, the user of the SANCHEZ Account checked in to the page “Nueva York”, which is Spanish for New York. Later that day, the user of the SANCHEZ Account checked in to Terminal 5 – John F. Kennedy International Airport.
- g. On 07/22/2019 the user of the SANCHEZ account checked in to Boston Logan International Airport. Additionally, in Facebook message conversation between

the user of the SANCHEZ Account and another user dated 07/23/2019, there is a photograph of a JetBlue Airline ticket confirmation. Present on the confirmation photo is texts that reads "Get set for your trip to Santo Domingo" and "your itinerary has been emailed to Mrs. [YGV]."

24. Based on my review of records associated with the SANCHEZ Account, the other facts reflected in this affidavit, and my training and experience, I believe that SANCHEZ is the user of the SANCHEZ Account, and that she is the individual utilizing the YGV identity for purposes of international travel and for other purposes. Based on the foregoing, I have probable cause to believe that SANCHEZ has obtained and utilized fraudulently obtained U.S. passports in the name of YGV.

#### Wire and Bank Fraud

25. As noted above, a check from a Citizens Bank account associated with SANCHEZ's business was used to pay the renewal fee for one of the passports in the YGV name.
26. The June 9, 2016 form DS-82 (Passport Renewal Application) # xxxxx3637 lists the following address for YGV: 240 Warren St. #304, Roxbury, MA 02119. Merrick Bank has produced records relating to a Visa card in the name of YGV with the address 240 Warren St. Apt. 304, Roxbury MA 02119-2290, including a statement dated May 23, 2017.
27. Citizens Bank has produced records that show an account for D'Yris Salon was opened in October 2015; the business signature card was signed under the name YGV.
28. Santander Bank has produced records that show that someone using the name YGV submitted a new account application in December 2015. This application specified the address of 240 Warren St., Roxbury, MA and the MA DL # Sxxxx7092. A copy of MA

DL # Sxxxx7092 is included in Santander's files. Under business entity information, the application lists D'Yris Salon. Santander Bank also produced records for what appears to be a separate account in the name of YGV and another individual. These records included statements from 2016 that referenced the address 240 Warren St. Apr. 304, Roxbury, MA and statements from 2019 (including as recently as October 2019 that referenced the address 29 W Milton St. Apr. 2, Hyde Park, MA. Certain statements referenced various transactions, including what appear to be debit card transactions.

29. I am aware that Citizens Bank, Santander, and Merrick Bank are each insured by the Federal Deposit Insurance Corporation. Based on my training and experience, I am aware that such banks commonly utilize interstate wires to process transactions (including debit card transactions) and credit applications and to engage in accountholder correspondence.

30. Based on the foregoing, and my review of the pertinent records, I believe that SANCHEZ has misrepresented her identity as that of YGV to apply for and open certain bank or credit accounts and to engage in various banking or credit transactions.

#### Search for Records

31. The October 2018 RMV application to renew MA DL # Sxxxx7092 listed the applicant's residential address as 29 West Milton St, Apartment #2, Hyde Park MA, 02136.

Accompanying this application as proof of residence was a bill from Arbella Insurance with a payment due date of October 25, 2018 that listed the name YGV and the address of 29 W. Milton St, APT 2, Hyde Park MA 02136. Also accompanying this application was a bill from Eversource with a date of October 1, 2018 that listed the address of 29 W Milton St, Hyde Park MA 02136-1921.

32. On August 10, 2019 the user of passport # xxxxx2824 in the name (*i.e.*, SANCHEZ) was questioned by CBP officers at Logan International Airport upon her return from Santo Domingo. When asked by officers to confirm her home address, SANCHEZ told the officers that she currently resides at 29 W. Milton St Apt 2, Hyde Park, MA 02136.
33. 108.49.156.4 is an IP address that has been used frequently to access the SANCHEZ Account, including as recently as October 17, 2019. According to records produced by Verizon the internet provider, the physical address associated with that IP address on certain dates on which this IP address was used to access the SANCHEZ Account was "29 W MILTON, APT 2, HYDE PARK, MA 02136."
34. On December 19, 2019 BFO Special Agent Nick Trapani and I conducted surveillance of 29 W Milton Street, Hyde Park, MA from approximately 0550 to 0850. At approximately 0820 that morning, we observed an adult female who I recognized as SANCHEZ exit the front door of the residence and enter an orange Nissan Rogue vehicle with MA license plate xxx879.
35. I know, based on my training and experience, that:
- a. Individuals often keep identification documents and other evidence of identity for long periods – sometimes years – and tend to retain such documents even when they depart a given residence. Such documents include Social Security cards, passports, tax returns, legal documents, utility bills, phone bills, health insurance or prescription cards, medical records, marriage licenses, family records, scrapbooks, photographs, diplomas and other school records, birth certificates, immunization records, bank records, credit card statements, personal correspondence, and books or mementos on which they have inscribed their

names.

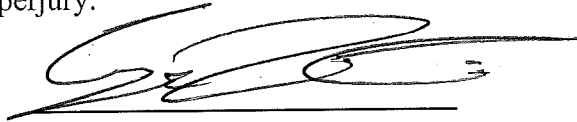
- b. Individuals often keep identification documents and other evidence of identity in their residence, in part to ensure the security of these documents and in part to allow for access to these documents when needed.
- c. In addition, it is common for those who use other persons' identities without authorization to maintain fraudulently obtained identification documents in secure locations within their residence to conceal them from law enforcement authorities; and
- d. It is common for individuals who use fraudulently obtained identification documents to retain those documents for substantial periods of time so that they can continue to use the fraudulently obtained identities.

### **Conclusion**

36. Based on the foregoing, and on my training and experience, I believe that there is probable cause to believe that Yris Solmeida SANCHEZ has unlawfully utilized the identity of YGV and has used fraudulently-issued U.S. passports in this name. I further believe that there is probable cause to believe that SANCHEZ, on or about August 10, 2019, (1) willfully and knowingly used a United States passport, which passport had been issued and designed for the use of another person, in that SANCHEZ presented that passport at Boston Logan International Airport, and (2) knowingly transferred, possessed and used, during and in relation to any felony violation enumerated in 18 U.S.C. 1028A(c), and without lawful authority, a means of identification of another person in violation of 18 U.S.C. § 1028A.


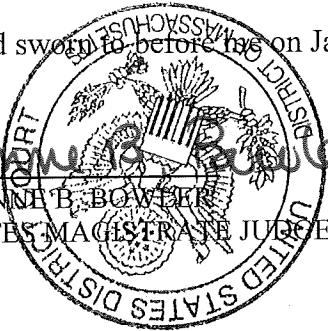
37. Based on the foregoing, and on my training and experience, I also have probable cause to believe that evidence, fruits, and instrumentalities of the TARGET OFFENSES, as described in Attachment B, are located in the premises described in Attachment A.

Sworn to under the pains and penalties of perjury.



Eugene Wheelis  
Special Agent  
Diplomatic Security Service

Subscribed and sworn to before me on January 3, 2010

  
HON. MARIANNE B. BOWER  
UNITED STATES MAGISTRATE JUDGE

## **ATTACHMENT A**

### **Premises to Be Searched**

PREMISES: 29 W Milton St, Hyde Park, MA 02136, Unit 2, is the upstairs unit within a two family home located in a residential neighborhood. The residence sits directly across from the intersection of W Milton Sreet and Vallaro Road. The home is white in color, with the numbers "29" prominently displayed on the front door.



## **ATTACHMENT B**

### **Evidence to Be Searched for and Seized**

Evidence, fruits, and instrumentalities of violations of misuse of a passport, in violation of 18 U.S.C. § 1544, aggravated identity theft, in violation of 18 U.S.C. § 1028A, false representation of a Social Security number, in violation of 42 U.S.C. § 408(a)(7)(B), wire fraud, in violation of 18 U.S.C. § 1343, and false statement in a credit application, in violation of 18 U.S.C. § 1014, including but not limited to:

1. The following records, documents, and items referencing Yris SANCHEZ, the individual known to agents with the initials YGV (SSN of xxx-xx-4172):
  - a. Any and all government-issued or apparently government-issued identification documents, or documents referencing or relating to such identification documents;
  - b. Any and all immigration documents, including but not limited to U.S. or foreign issued (or apparently issued) passports and identification cards;
  - c. Any and all records identifying citizenship or nationality, including but not limited to birth certificates; voter registration cards; cedulas; and social security cards.
  - d. Any and all records relating to foreign or domestic travel, including tickets; schedules; itineraries; or receipts.
2. Any and all records evidencing the identity of SANCHEZ or YGV, including but not limited to employment records, bank records, credit card records, tax records, marriage records, divorce records, baptismal or confirmation records, residential lease or rental records, health insurance records, utility/phone/cable records, arrest/court

records, personal correspondence, or records of school, training, or counseling.

3. Photographs depicting SANCHEZ, and any photograph album or compilation containing one or more photographs depicting SANCHEZ.
4. Any and all records referencing or relating to Francisco Sanchez Segura, Carmen Luisa Jiminez, Carmen Luisa JIMENEZ: Hector Sanchez Jiminez, Carlos Sanchez Jiminez, Yunior Sanchez, or Carmen Sanchez (*a/k/a* Carmen Correa).
5. Any and all evidence reflecting the identity of the user of the Facebook account with user ID "Yolanda Sanchez" and page ID "facebook.com/yris.sanchez."